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Creating a Truly Independent DC Housing Authority

Increasing Political Insulation to Improve Outcomes at DCHA



DC Office of the Attorney General

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Letter from Attorney General Karl A. Racine

Since taking office in 2015 as DC's first independent and elected Attorney General, I have made it a central priority of the Office of the Attorney General (OAG) to fight for DC's most vulnerable residents. Core to our mission is our work to protect DC tenants.

OAG has led the fight against housing discrimination and inhumane and unhealthy living conditions in the District. We have sued the city's most notorious slumlords and have won \$4.8+ million for DC tenants forced to live in unsafe and unlawful conditions and since 2016, have won \$10+ million in penalties through our housing work.

We have stood up for tenants and challenged unfair practices wherever they occur. That includes the biggest slumlord in our city: the DC Housing Authority (DCHA). OAG has sued DCHA not once, but twice, in recent years over their mistreatment of residents because there is no way to end tenant abuse and neglect in the District without addressing the conditions at DCHA.

DCHA's reach goes far beyond any other landlord in the city; the agency serves more than 50,000 DC residents including more than 15,000 children, more than 6,000 seniors, and more than 10,000 residents with disabilities – which means the agency's failures have further reaching impacts than any other landlord.

Now my office is releasing this report to compel the governance changes that are needed to get DCHA back on track. We are holding DCHA accountable just like we would any other landlord.



The consequences of DCHA's mismanagement and failures couldn't be more serious. Thousands of DC residents have been denied access to safe, stable housing because of DCHA's dysfunction. Millions of our tax dollars are going to waste. And every day, people are losing more and more faith that failures will be adequately addressed. Urgent action is essential. DC residents deserve better.

As I look back on my time as Attorney General and prepare to leave office in a couple of weeks, there is no work I'm more proud of than our office's fight for tenants. I am hopeful that the leaders that follow—both at OAG and the DC Council—will continue this crucial work to hold all landlords (including DCHA) accountable. This report outlines just a subsection of the necessary steps to reform DCHA.

Sincerely,

A handwritten signature in black ink, appearing to be 'KARL A. RACINE', written in a cursive style.



Executive Summary

The independence of the DC Housing Authority (DCHA), has been undermined by a majority of the Board being controlled by political allies of the mayor. As a result, DCHA has turned its focus away from its mission of providing deeply affordable housing and instead has become a development arm of the mayor's agenda. Furthermore, the lack of oversight by the Board of Commissioners (the Board) and experienced leadership has led problems at the agency to go unchecked and dysfunction to run rampant. DCHA's failures have real consequences for the low-income residents relying on the agency to provide them safe and stable housing.

In order to address the dysfunction at DCHA, we believe we must start with making DCHA truly independent. In pursuit of this goal, we propose reforming the Board of Commissioners to remove the Deputy Mayor for Planning and Economic Development (DMPED), requiring political appointees be selected from a list that is pre-approved by an advisory group, and mandating that appointees have a minimum number of years of experience in a specific issue-area related to DCHA's portfolio. Finally, we suggest increasing the qualifications for the executive director. We also call on the DC Council to finally provide the robust oversight necessary to oversee the agency.

While these recommendations alone will not solve the problems at DCHA, they are a crucial first step. We urge the DC Council to carefully consider these recommendations, including by listening to tenants' input. DCHA is in desperate need of reform and we need solutions, not just change for the sake of change. The stakes are too high not to get this right.

Introduction

On October 7, 2022, the U.S. Department of Housing and Urban Development (HUD) released a damning report on the state of DC's public housing authority, DCHA. The report detailed more than 80 violations of federal rules and regulations and painted the picture of an agency that has systematically failed DC residents. Indeed, HUD's report indicated DCHA had one of the lowest occupancy rates in the country.

The consequences here cannot be overstated. DCHA is charged with operating DC's public housing and housing choice voucher programs; programs our lowest-income residents—often seniors, single-parent families, or people with disabilities—rely on for safe and stable housing. When DCHA fails, it is these residents who bear the cost.

In a city with ever rising housing prices, DCHA's failure to provide housing to DC residents directly contributes to the twin phenomena of housing insecurity and displacement. Furthermore, even for residents who are housed by DCHA, the abhorrent conditions they are forced to live in has severe impacts on their physical and emotional health. Voucher-holder Kisha McDougald summed it up best: "People don't think about the toll [inhumane housing conditions] take on your mental health, your emotional health. That is serious, serious stuff. Your home is supposed to be your safe place and your peace... our home is more than a structure."

While the HUD report brought necessary attention to the deficiencies at DCHA, it was by no means the first accounting of these problems. Public housing tenants and voucher

recipients have been raising the alarm about the agency's serious failures for years. They have reported buildings in disrepair, an inconceivably long waitlist, and failures to provide voucher recipients with the support they need to find and secure safe and stable housing.

At OAG, we have been acutely aware of DCHA's failings. In 2020, OAG filed a lawsuit against DCHA over the agency's failure to implement adequate safety measures in public housing properties. In 2022, OAG was once again compelled to sue DCHA for systematically failing tenants with disabilities.

In DCHA's formal response to HUD on November 29, 2022, the agency touted its progress towards solving the identified problems and optimistically outlined its plans to further address concerns. While the agency's reactive response provides some hope of improvement, it does not outline any proactive steps to address the structural problems that have allowed DCHA to fall into such severe dysfunction.

Since the HUD report was released, OAG has spoken with more than a dozen housing policy experts, tenants, advocates, and others with knowledge of DCHA's operations about what is needed to fix the agency. While some of their comments are included in this report, the majority of individuals we spoke with preferred to stay anonymous. Nearly every person we have spoken with has emphasized that we cannot fix DCHA without reforming the agency's leadership and governance structures to bolster the agency's independence from the Executive Office of the Mayor and eliminate harmful political influence.



“Your home is supposed to be your safe place and your peace... our home is more than a structure.”

Using our significant experience investigating, suing, and negotiating changes to large entities that fail to live up to their legal requirements, as well as fighting for the rights of tenants, OAG is issuing this report to recommend structural changes to get DCHA back on track.

History of DCHA's Governance

The current governance structure of DCHA is in many ways a response to the failures of its precursor, the DC Department of Public and Assisted Housing (DPAH).

By the 1990s, DPAH was in a state of dysfunction and in 1992, problems at the agency reached a peak when families on DC's public housing wait list filed a class action lawsuit in Superior Court against DPAH, alleging that the department's high unit-vacancy rate violated federal law.

In 1994, a court ruled that DPAH was incapable of governing itself and placed the agency in receivership. City leadership had to relinquish control of the agency and a receiver—David Gilmore—was given unilateral control to reform the agency. Gilmore was considered eminently qualified. At the time, he was serving as the director of the Seattle Public Housing agency and had previously been part of the teams that turned around the public housing agencies in San Francisco and Boston.

Gilmore's first job was to create independence between the agency and DC government. Prior to receivership, many of DPAH's problems stemmed from political leaders using the housing authority for "uses other than the delivery of housing services to its tenants," primarily as a way to reward political allies with appointments, leading to unqualified and

politically motivated individuals leading the agency.¹

Gilmore provided the needed independence and is credited with turning the agency around and creating an atmosphere of transparency and accountability.²

In 1999, Gilmore determined that the agency, now reconstituted as the DC Housing Authority, was ready to exit receivership. However, in order to ensure the problems that plagued DPAH did not reemerge, Gilmore was insistent that the agency retain the independence he ushered in.

In an op-ed arguing the merits of the legislation restructuring DCHA, Gilmore wrote that "Public housing authorities function best when they are independent of political interests. Appointments to the governing board should be made on the basis of merit, not political allegiance, and should be beholden to no particular faction of officialdom -- only to the interests of the agency and its clients."³

In pursuit of the independence Gilmore advocated for, the DC Council passed legislation that established DCHA as an "independent authority of the District government," which functions as a "corporate body" with a "legal existence separate from the District government."⁴



*"Public housing authorities function best when they are **independent** of political interests. Appointments to the governing board should be made on the basis of merit, not political allegiance."*



“There were other people who weren't in the mayor's pocket and those people weren't seriously considered.”

The legislation also established a 9-member Board of Commissioners to govern the agency. The Board consisted of:

- 4 mayoral appointees, including 1 designated to be the Board Chair
- 3 elected resident commissioners
- The Deputy Mayor for Planning and Economic Development (DMPED)
- 1 representative of the central labor council

In 2010, the DC Council added 2 additional Board members

- 1 housing choice voucher recipient appointed by the mayor
- 1 representative of the DC Consortium of Legal Service Providers

In 2021, the DC Council added 2 more Board members, both of whom are required to have “professional experience designing and developing public and private multi-family housing”:

- 1 mayoral appointee
- 1 DC Council appointee

However, the bills establishing DCHA's governance structure have not had their intended impact.

Without guardrails to prevent the mayor from appointing people who will execute the mayor's agenda, we are left with a Board that is nominally independent but, in most people's estimation, essentially controlled by the mayor.

Currently, the Board is stacked with allies to the mayor who are willing to prioritize the mayor's agenda over DCHA's. Many of the mayor's appointees have little to no experience in affordable or public housing and as a result, are susceptible to blindly taking direction from the mayor or from the DMPED (who also sits on the Board). In addition, many of the appointees have a history of supporting the mayor politically, suggesting they have an allegiance to the mayor's agenda.⁵ As the HUD report noted, mayoral appointees tend to vote as a block, suggesting they are not individually considering proposals but instead voting in the mayor's interest.

This also has led to the Board appointing political allies of the mayor as executive directors. One of the individuals we spoke with shared that during the hiring process for the predecessor to the current executive director, Tyrone Garrett, “there were other people who weren't in the mayor's pocket and those people weren't seriously considered.”

Mayoral Appointees

1999

Seats added in 2010

Seats added in 1999



Board Chair, Mayoral Appointee
Currently held by
Dionne Bussey-Reeder



Mayoral Appointee
Currently held by
Lejuan Strickland



Mayoral Appointee
Currently held by
Ed Fisher



Deputy Mayor for Planning and Economic Development
John Falcicchio



Mayoral Appointee
Currently Vacant



Housing Voucher Recipient
Currently held by Ronnie Harris



Design/Development Representative, Mayoral Appointee
Currently held by Melissa Lee



Resident Commissioner
Currently held by
Kenneth Council



Resident Commissioner
Currently held by
Janet Parker



Central Labor Council Representative
Currently held by
Ann Hoffman



Resident Commissioner
Currently held by
Denise Blackson



DC Consortium of Legal Service Providers
Currently held by Bill Slover



Design/Development Representative, Council Appointee
Currently held by Raymond Skinner

Consequences of Political Influence Over DCHA

The loss of political independence at the agency has had real consequences. Instead of effectively running the public housing and voucher programs, DCHA has focused on furthering the development goals of the mayor. Furthermore, DCHA's Board of Commissioners has failed to provide adequate oversight over the agency and there is a dearth of experienced leadership at the top rungs of the agency, leading to a lack of checks and balances and informed decision making.

Loss of Mission Focus

A consensus view from the experts we spoke to is that influence from the mayor's office—often channeled through the DMPED—has led the agency to turn away from its stated mission and focus more on development goals.

Any mayor, especially a mayor who has set ambitious development goals, has an interest in creating more development in the city. Development—especially market-rate and retail development—brings in revenue for the city and attracts newcomers. However, these development goals require land, and in a city like DC where land is scarce, DCHA's portfolio is incredibly valuable and political leadership has an incentive to use it for their own agenda.

It is up to DCHA's leadership and ultimately its Board of Commissioners to ensure that DCHA's land is furthering the agency's affordable housing mission, not being co-opted for development purposes. However, reporting from District Dig's Jeffrey Anderson (who has covered DCHA extensively) suggests that political influence over the agency has led the Board of Commissioners and the executive director to further the mayor's development agenda at the cost of DCHA's affordable housing mission.⁶

To illustrate this, many we spoke to pointed to the New Communities Initiative (NCI), a program launched nearly two decades ago to redevelop dilapidated public housing. NCI is a cooperation between the DC government and DCHA. Through this cooperation, DCHA provides land where dilapidated public housing sits and the DC government, administered by the DMPED, uses the land to build "vibrant mixed-income neighborhoods... where residents have quality affordable housing options, economic opportunities and access to appropriate human services."

One of the tenets of NCI is that every unit of public housing should be replaced in the new developments. This principle, referred to as "one-for-one" replacement⁷ is what makes the deal worth it for DCHA—they are giving up their land to development, but in return, their public housing stock is redeveloped.

However, the promise of one-for-one replacement has not been universally fulfilled and plans approved by DCHA leadership have included a net loss of affordable housing at the NCI sites.⁸ That means, DCHA's part of the deal hasn't been realized. As a result, DCHA is sacrificing public housing for the sake of development.

Another example of DCHA's loss of focus on affordable housing is the deal DCHA made regarding its headquarters. The property, capable of housing 1,000 units, had the potential to provide desperately needed deeply affordable housing to hundreds of families. Instead, DCHA sold the headquarters to a group of developers whose plan creates no new "hard, deeply affordable units."⁹ In sum, DCHA gave up a vital piece of its real estate profile and got nothing back in return for the residents they are meant to serve. Not only that, but DCHA likely undervalued the property, meaning they lost out on funds they could have used to build more public housing.¹⁰



Developers close to the mayor who received the contract to redevelop DCHA Headquarters are featured on sign outside the building (pictured above).

Non-mayoral appointees on the Board have pushed back on deals that promote the development interests of the mayor over DCHA's mission. During discussion on a deal related to the NCI initiative, Board member Bill Slover—the appointee of the legal advocate community—pointed out the need to ensure DCHA benefited the most from the deal saying, "[we've] got to, at some point, just take a step back and make sure we're doing the best here by everybody in using our resources as best we can."¹¹ However, Slover and other non-mayoral appointees who are concerned about DCHA drifting away from its mission have been overruled by the mayoral appointees who have voted in favor of these projects.

all these mixed finance projects... residents of public housing and the voucher program are an afterthought." In other words, in pursuit of the mayor's development agenda, the actual agenda of the agency has been put on the back burner. As a result, we have seen the problems raised by the HUD report (that existed long before the report was published) go unaddressed.

Lack of Effective Oversight

However, the co-optation of DCHA's mission is not the only consequence of outsized political influence. In addition, the agency lacks a system of checks and balances to hold agency executives accountable and ensure good decision-making. One advocate we spoke with said of the Board that "they don't seem to engage with anything critically. They just seem to vote in whatever way, like the mayor and her team wants them to vote." In fact, one person with knowledge of the Board's operations suggested that Board votes have become a de facto formality—a chance for the Board to rubberstamp whatever is brought to them, sometimes when it is too late to stop a plan already in motion.

The lack of thorough review of proposals by the Board has allowed problematic decisions to go through unimpeded. The highest profile of these is the Board's approval of a contract to the significant other of Board Chair Neil Albert without either party disclosing the conflict of



*If you look at the time and energy [DCHA] spends... the majority of it is spent on how we redevelop all these mixed finance projects... residents of public housing and the voucher program are an **afterthought**.*

DCHA's focus on development has also eclipsed the other priorities of the agency. One individual with close connections to the agency pointed this out saying, "if you look at the time and energy [DCHA] spends—as a Board and a staff—the majority of it is spent on redeveloping

interest. Albert's actions led to his resignation from the Board, a \$15,000¹² ethics fine, and a criminal investigation by the U.S. Attorney's Office.¹³ Even though Albert and Moya's relationship was reportedly an "open secret" by

the time of the 2021 Board vote, and even though the firm did not meet the requirements set forth in the request for proposal, all the mayoral appointees to the Board approved the contract.

While this is the most egregious example of misconduct, it is not the only questionable deal that the Board has approved. Anderson's reporting has highlighted that the Board has approved awards going to political allies of the mayor time and time again, even in instances where the developers did not meet qualifications or there were other irregularities with their plans or proposals. One expert said that the awarding of contracts to political allies of the mayor without interference by the Board has become so extreme that "really good developers, good product at a good price, don't want to come to this town because they know they can't compete, they won't win. It's an insider game."



"Really good developers... don't want to come to this town because they know they can't compete, they won't win. It's an insider game"

Furthermore, the Board's various chairs—appointed by the mayor—have been known to shut down debate or insulate agency staff from having to answer tough questions posed to them by non-mayoral appointees. For example, one of the issues raised by the HUD report is that DCHA is not conducting rent reasonableness assessments, a core process designed to ensure the agency is not wasting funds and that the

rents charged to voucher holders are appropriate. Concerns about rent reasonableness were raised by Slover (a non-mayoral appointee) in the summer of 2022. When Slover attempted to question the executive director about how DCHA approves rents, the Board Chair Dionne Bussey-Reeder (a mayoral appointee) intervened to end the line of questioning.¹⁴

Had the majority of Board members exercised more aggressive oversight and pushed back on agency executives, then they may have been able to force the agency to act on the problems raised in the HUD report or at least prevent unethical behavior at the expense of residents.

Lack of Knowledge and Experience

Finally, many feel that a desire for political loyalty has led to the appointment of executive directors who are unequipped for the position. Brenda Donald, the current executive director, comes to the agency without previous housing experience and Tyrone Garrett, her predecessor, had previously run a housing authority just a fraction of the size of DCHA.¹⁵

Experts we spoke to suggested that a lack of knowledge and experience at the top has trickled down to a "brain drain" throughout the agency in which people with institutional knowledge either left the agency or were pushed out, resulting in a staff that is not properly trained and unequipped to handle the needs of residents. Advocates spoke about frustration with constant turnover and not knowing who to bring concerns to or bringing concerns to staff just for them to not know how to handle them. Many experts believe that the problems outlined in the HUD report exist not simply because of an unwillingness to address them, but because the staff "has no understanding of how the processes work."

Recommendations to Achieve Real Independence

We propose four solutions to insulate DCHA from political influence and ensure the goals of the post-receivership legislation are actually met. We urge the DC Council to take legislative action to implement these solutions.

1. Remove the Deputy Mayor for Planning and Economic Development from the Board.

We must remove the DMPED from the Board of Commissioners. While there is no doubt that mayoral and political influence exists outside of the DMPED's role on the Board, it is also clear that the DMPED's position on the Board raises unique conflicts of interest that must be addressed. The DMPED oversees the development goals of the administration. In this role, the DMPED is responsible for negotiating development deals in the mayor's best interest, many of which come before the the Board for approval.

When a deal negotiated by the DMPED comes before the Board, the DMPED is expected as a commissioner to vote, and persuade others to vote, in the interest of DCHA, not the city and the mayor. However, it is nearly impossible for the DMPED to put aside their allegiance to the city's development goals—especially when they themselves negotiated the deal.

In order to eliminate this conflict of interest and ensure all Board members are solely voting in the interest of DCHA, it is imperative that we remove the DMPED from the Board.

2. Ensure Board appointments are based on qualifications, not political loyalty.

We must ensure that all Board appointments are made on the basis of qualifications, not political loyalty. James Stockard Jr., the special master whose report led the agency into receivership, said it best when he wrote in a Washington Post op-ed that "When mayors appoint commissioners for political reasons rather than for their wisdom and insight, agencies fail."¹⁶ In order to ensure political appointments are not politically motivated, we recommend the DC Council consider a series of potential reforms to the Board.

Require Political Appointees to be Selected from a Group of Pre-qualified Individuals

We advise that the DC Council explore instituting a requirement that nominees to the Board be selected from a pre-qualified group of individuals identified by an advisory group. This would help eliminate any reality or appearance that elected officials are choosing lackeys to serve on the Board by ensuring an independent third party has previously vetted all potential appointees.

To increase tenant say in decision making, we recommend that the advisory group be made up of elected tenant representatives and the legal advocate community. Elected officials would have



*"When mayors appoint commissioners for political reasons rather than for their wisdom and insight, **agencies fail.**"*

the ultimate say in who they appoint to the Board, but there would be an added layer of assurance that people were not chosen for political motivated reasons.

Increase Qualifications for Board Members

We also encourage the DC Council to increase the qualifications for appointment to the Board of Commissioners. One reason the mayor is able to exercise significant power over existing appointees is because they lack deep experience of their own, making them less able to push back on what, for example, the DMPED advises them to do and to instead vote as block in favor of the mayor's agenda.

Currently, only two commissioners are required to have specific housing experience and even this is defined broadly without a mandate for a certain number of years of experience or any other signal of depth of knowledge and expertise. The remaining commissioners must have experience in one of a number of broad arenas, some of which are only tangentially related to DCHA such as "philanthropy and social services." These qualifications are insufficient for the task at hand.

We recommend narrowing qualifications to ensure all Board members have a robust understanding of at least one aspect of DCHA's operations, whether that be property management, affordable housing development, or others. We recommend the DC Council develop a list of areas of expertise that should be represented on the Board and require that a subject-matter expert in each area is appointed to the Board. Furthermore, we recommend adding quantifiable metrics to ensure a depth of experience (for example requiring a minimum number of years of experience in a senior position in the field). Critically, it will be up to the DC Council to ensure that all appointees meet these qualifications before

confirming them. This will require robust oversight, particularly from the committee and the committee chair tasked with overseeing DCHA.

Strengthen Conflict-of-Interest Provisions

We recommend strengthening the existing conflict of interest protections to ensure that Board members or people with whom Board members have a personal relationship do not stand to profit from any action of DCHA or that if they do, they recuse themselves from relevant decision making. Currently, the law dictates that the Board, by majority vote, can require disclosure of conflicts of interest or recusal. While under federal law, "no officer, employee, contractor or agent...shall participate in the selection, or in the award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent, would arise"¹⁷ this applies specifically to deals made with federal funds and as DC pours more and more money into the agency from local budgets, it is crucial that we have equally strong local laws. We recommend mandating disclosure and recusal in statute.

Strengthen For-Cause Removal Requirements

In addition, we recommend requiring cause before appointees can be removed from the Board. These types of for-cause removal provisions ensure that the mayor cannot remove Board members when they disagree. This allows Board members to exercise good judgment and oversight without fear of political retaliation.

As we write this report, the DC Council is considering legislation that would remove the dissenting commissioners from the Board. This is a blatant attempt to silence the people who have been raising concerns for years, concerns that were just confirmed by the HUD report. We must prevent against actions like this that chill dissent and scare Board members away from raising concerns.

3. Raise qualifications for the executive director.

The overwhelming professional consensus is that DCHA needs an executive director who is not just a skilled manager but who has specific expertise around affordable and public housing. For example, in a journal article about DCHA's leadership and the success of the receivership, Lynn Cunningham (an Attorney who represented plaintiffs in the suit that resulted in DCHA being placed in receivership) writes that "having an executive director with program-specific management skills who can run a complex agency is vital."¹⁸ To justify appointing executive directors without expertise in housing, Board members and the mayor have argued that their appointees' supposed credentials as skilled managers are sufficient expertise. However, in a city as talent-rich as DC, surely we can find someone who is not only a talented manager but who has the issue area-expertise to run the housing authority.

Currently, there are no qualifications that are mandated by statute narrowing who is qualified to serve as executive director. We recommend addressing this by adding clear and measurable requirements for the executive director and applying the same heightened conflict of interest and cause for removal standards that we have recommended above for Board positions to the executive director position.

4. Improve DC Council Oversight

Many we spoke to were frustrated by the lack of DC Council oversight over the agency and many felt that new leadership was necessary. The DC Council has argued that they are limited in their oversight abilities because DCHA receives

significant federal funding and further, that the DC Council has done its part by increasing funding. Conversely, many advocates have pleaded for the DC Council to take a more hands-on approach, saying councilmembers "have more power than they let on."

The DC Council plays a fundamental role in assuring the mayor is not exerting too much political influence and that the agency is functioning properly. It is crucial that the committee(s) tasked with this responsibility make doing so a priority and that committee leadership be equipped to do so. Existing leadership has not proven that it is willing to conduct rigorous oversight. Changes must be made to ensure effective oversight. In addition, we recommend requiring the chair of the housing committee to receive training from HUD, as has been required of the executive director and the Board.



"having an executive director with program-specific management skills who can run a complex agency is vital."

Conclusion

The recommendations we have presented are the result of months of research, conversations with stakeholders including tenants and advocates, and thoughtful deliberation. We urge the DC Council to take them into careful consideration.

Changing the structure of how DCHA operates requires transparency and input from those who are most affected, including public housing residents and voucher holders. DCHA has failed them for years, and we owe it to them to earn back their trust. The most concerning thing we heard during our interviews with experts was that DCHA doesn't "care about poor people." We must change this narrative by encouraging tenants to help shape what we do next to overhaul DCHA.

The problems at DCHA demand thoughtful, robust reforms. We cannot make changes for the sake of changes. We must find solutions. The stakes are too high for anything less. We must act quickly, but we must also act thoughtfully. Hopefully, this report provides valuable insight and suggestions as to the governance of the agency while broader reforms are crafted.

Ensuring DCHA's independence will not fix all the problems at the agency, but it is an important first step. We urge the DC Council to carefully consider these recommendations.

Endnotes

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